

DEPARTMENT OF FOOD AND AGRICULTURE



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APR 28 1999

April 27, 1999

Mr. Lester Snow, Director
CALFED Bay-Delta Program
1416 Ninth Street, Room 1155
Sacramento, California 95814

Dear ^{Lester}Mr. Snow:

In reviewing the April 27 version of the CALFED Program Decision, I found that the treatment of conveyance has changed significantly from that of the December 18 Revised Phase II Report. Specifically, much of the discussion of the adaptive management of the Delta conveyance element (pages 87 to 92 of the Revised Phase II Report) is no longer be a part of the Preferred Alternative. As I discussed this with Deputy Secretary Yates, he asked that if significant conveyance alterations to the existing Delta were needed in the future (such as an ICF), wouldn't a supplemental Programmatic EIS/R be required? My response was that the Small Group discussed this very issue and came to the conclusion that a supplemental PEIS/R would be required. Could you please confirm that this is in fact the case? If it is, we don't recall when the Policy Group made the decision to remove the programmatic mechanism to include comprehensive adaptive management for the Delta conveyance element. Could you please recount how and when this decision was made?

It seems to me that by completely removing the ICF from consideration in the Preferred Alternative as CALFED moves forward, creates difficulties in crafting a south Delta improvements approach that meets the CALFED solution principles including improvements in all resource areas, durability of the solution and no redirected impacts. Furthermore, in all seriousness, it may in fact be difficult to defend a Least Environmentally Damaging Practicable Alternative (LEDPA) decision that does not include a contingency plan for an ICF as included in the Revised Phase II Report.

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My initial review of the South Delta Improvements Program Proposal only reinforces my concerns. Either comprehensive approach (1 barrier or 4 barriers) pushes water supply reliability improvements farther out into the future, and results in additional direct impacts to agricultural resources in the Delta, and indirect impacts in export areas. I have similar concerns with the Consolidated Diversion approach to screening in the south Delta as compared to the 2 Points of Diversion approach. The latter approach would result in full export capacity screened by the end of Stage 1, while the former would take an additional three years. Concurrent evaluation and refinement of an ICF during Stage 1 seems to be a prudent approach to assure durability of the CALFED solution to Delta conveyance.

Sincerely,



Steve Shaffer
Research Program Specialist II